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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CYNTHIA GOODWYN,

**Case No. 2:18-cv-01754-JAD-EJY**

Plaintiff,

11 | VS.

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(SEVENTH REQUEST)**

ALBERTSON'S LLC.

Defendant

15 In accordance with Local Rules of Practice for the United States District Court for the  
16 District of Nevada (“LR”) 26-4, Defendant Albertson’s LLC (“Defendant”), by and through its  
17 counsel of record, the law firm of BACKUS, CARRANZA & BURDEN, and Plaintiff Cynthia  
18 Goodwyn (“Plaintiff”), by and through her counsel of record, the law firm of SGRO & ROGER,  
19 hereby stipulate and agree to an extension of all remaining discovery deadlines by sixty (60)  
20 days. The parties propose the following revised discovery plan:

## **DISCOVERY COMPLETED TO DATE**

22 The parties have exchanged initial and supplemental disclosures of documents and the  
23 names of individuals with knowledge of the facts pertaining to the claims set forth in this matter.  
24 The parties have propounded and responded to written discovery requests including  
25 interrogatories and requests for production. Defendant has subpoenaed Plaintiff's medical

1 records and taken Plaintiff's deposition. Plaintiff has taken the deposition of Defendant's FRCP  
2 30(b)(6) witness. The parties have made initial and rebuttal expert disclosures.

3 **DISCOVERY TO BE COMPLETED**

4 The parties intend to take the deposition of experts, Plaintiff's treating physicians and other  
5 percipient witnesses.

6 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

7 Given the current health emergency occasioned by the outbreak of the novel coronavirus  
8 (COVID-19) and the corresponding Stay-At-Home Order, the Parties have postponed depositions  
9 due to the difficulty in preparing and defending witnesses remotely. Further, following Governor  
10 Sisolak's directive to combat the spread of COVID-19, law firms for the Parties have been closed to  
11 the public and counsel have been working remotely with limited staff and resources which  
12 significantly impacted the Parties' ability to conduct discovery and meet the applicable deadlines.  
13 The parties therefore request for a 60-day extension of the remaining discovery deadlines in light of  
14 the COVID-19 pandemic. This request is made in good faith, not for the purpose of delay.

15 **PROPOSED NEW DISCOVERY DEADLINES**

16 **Initial Expert Disclosure:**

17 Currently: January 6, 2020

18 **Proposed:** N/A

19 **Interim Status Report:**

20 Currently: January 6, 2020

21 **Proposed:** N/A

22 **Rebuttal Expert Disclosure:**

23 Currently: February 5, 2020

24 **Proposed:** N/A

25 **Discovery Cutoff:**

Currently: June 4, 2020

**Proposed:** **August 3, 2020**

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